IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: NATIONAL COLLEGIATE ATHLETIC ASSOCIATION STUDENT-ATHLETE CONCUSSION INJURY LITIGATION – SINGLE SPORT / SINGLE SCHOOL (FOOTBALL)	)))))))))	**MDL No. 2492** **Master Docket No. 1:16-cv-08727** **This Document Relates To: All Cases** **Judge John Z. Lee** **Magistrate Judge M. David Weisman**

JOINT MOTION FOR AN EXTENSION OF TIME

Plaintiffs Kerry Bonds, et al. ("Plaintiffs") and Defendants National Collegiate Athletic Association, et al. ("Defendants," and collectively with Plaintiffs, the "Parties"), through their counsel, jointly and respectfully request an extension of time until Wednesday, May 31, 2017, to submit a proposed Case Management Order detailing attorney timekeeping/reporting and the establishment of a common benefit fund. In support of this motion, the Parties state as follows:

1. At a status hearing on March 28, 2017, the Court requested that the Parties submit a joint proposed Case Management Order, addressing the issue of attorneys' fees and costs. See Minute Entry (Dkt. #161).

2. Under the present schedule, the Parties are to submit the proposed Case Management Order to the Court by May 16, 2017. Minute Entry (Dkt. #176).

3. Since March 28, 2017, Plaintiffs' counsel have been discussing and reviewing drafts of the requested proposed Case Management Order on attorneys' fees and costs. On Friday, May 12, 2017, Plaintiffs' counsel sent Defendants' counsel a proposed draft Case Management Order.

4. Defendants are reviewing Plaintiffs' draft Case Management Order, but as there are now 28 Defendants in the consolidated actions, Defendants require additional time to

complete their review and provide comments on the draft Case Management Order to Plaintiffs' counsel. Further, the Parties may need to meet and confer regarding Defendants' comments (if any).

5. The Parties respectfully request an extension until Wednesday, May 31, 2017, to submit the proposed Case Management Order on attorneys' fees and costs to the Court.

6. The requested extension will not prejudice any party and is not brought for purposes of delay.

WHEREFORE, the Parties respectfully request an extension of time until Wednesday, May 31, 2017, to submit a proposed Case Management Order addressing the issue of attorneys' fees and costs. The Parties further request whatever other relief the Court deems appropriate.

Dated: May 16, 2017

Respectfully submitted,

By: */s/ Jay Edelson* (w/ consent)
Co-Lead Counsel for Plaintiffs

Jay Edelson
jedelson@edelson.com
EDELSON PC
350 North LaSalle Street, 13th Floor
Chicago, Illinois 60654
Telephone: (312) 589-6370
Facsimile: (312) 589-6378

Sol Weiss
sweiss@anapolweiss.com
ANAPOL WEISS
One Logan Square
130 North 18th Street, Suite 1600
Philadelphia, Pennsylvania 19103
Telephone: (215) 735-2098
Facsimile: (215) 875-7701

By: */s/ Johanna M. Spellman*
Liaison Counsel for Defendants

Johanna M. Spellman
johanna.spellman@lw.com
LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611
Telephone: (312) 876-7700
Facsimile: (312) 993-9767

By: */s/ Mark S. Mester*
Lead Counsel for Defendant NCAA

Mark S. Mester
mark.mester@lw.com
LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611
Telephone: (312) 876-7700
Facsimile: (312) 993-9767

Shannon M. McNulty
smm@cliffordlaw.com
CLIFFORD LAW OFFICES
120 North LaSalle Street, Suite 3100
Chicago, Illinois 60602
Telephone: (312) 899-9090
Facsimile: (312) 345-1565

Liaison Counsel for Plaintiffs

By: */s/ Michael A. Olsen* (w/ consent)
Lead Counsel for Conference Defendants

Michael A. Olsen
molsen@mayerbrown.com
MAYER BROWN LLP
71 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 782-0600
Facsimile: (312) 701-7711

By: */s/ Matthew A. Kairis* (w/ consent)
Lead Counsel for Member Institution Defendants

Matthew A. Kairis
makairis@jonesday.com
JONES DAY
325 John H. McConnell Boulevard, Suite 600
Columbus, Ohio 43215
Telephone: (614) 469-3939
Facsimile: (614) 461-4198

CERTIFICATE OF SERVICE

I, Johanna M. Spellman, certify that on May 16, 2017, a true and correct copy of the foregoing JOINT MOTION FOR AN EXTENSION OF TIME was filed through the CM/ECF system, which caused notice to be sent to all counsel of record.

/s/ Johanna M. Spellman

Johanna M. Spellman
johanna.spellman@lw.com
LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800
Chicago, Illinois, 60611
Telephone: (312) 876-7700
Facsimile: (312) 993-9767